SLO CELLULAR, INC. D/B/A
CELLULAR ONE OF SAN LUIS OBISPO
733 Marsh Street
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Magalie Roman Salas, Secretary
Office of the Secretary
445 - 12th Street, S.W.
Washington, D.C. 20554

Attention: Patrick Forster, Senior Engineer
Room 3-A104
Policy Division
Wireless Telecommunications Bureau

Re: Implementation Plan of Wireless E-911 Phase II
Automatic Location Identification
Notice Pertaining to CC Docket No. 94-102

REVISED E-911 PHASE II STATUS REPORT

Dear Ms. Salas:

In accordance with the Third Report and Order in CC Docket No. 94-102 and the Commission's related Public Notice, Mimeo DA 00-2099, released September 14, 2000, we hereby submit our revised report on the status of our implementation plans for Wireless E-911 Phase II Automatic Location Information ("ALI"). This report replaces the report filed in November 2000. The current report is as follows:

Background/Contact Information

1) Carrier Identifying Information:

SLO Cellular, Inc. d/b/a Cellular One of San Luis Obispo
TRS Number: 809306

2) Contact Information: David Pruett, Vice President
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E-911 Phase II Location Technology Information

1) Type of Technology: In our "Report on Enhanced 911 Phase II Implementation" filed in November 2000, we stated that switching functions for our cellular system were performed by AT&T Wireless Services, Inc.'s ("AT&T'S") Santa Barbara - Santa Maria - Lompoc, California MSA ("the Santa Barbara MSA") Frequency Block A cellular system; and that we proposed to employ the same Phase II ALI solution to be implemented by AT&T for its Santa Barbara MSA system. Since the filing of that report, we have installed our own Ericsson MSC 5000 switch and, accordingly, we have terminated our switch sharing arrangement with AT&T.

Because AT&T will deploy a network-based ALI solution for its California wireless operations, and because a substantial portion of our traffic is generated by roamers from the AT&T network, we intend to deploy a network-based ALI solution.

The State of California has consolidated its E-911 planning and roll-out functions in a single state agency, which has decided to bypass Phase I ALI in its entirety and to proceed directly to Phase II ALI. Among other things, the state agency presently intends to select a single, state-wide technology to be employed by the wireless carriers and the local Public Safety Answering Points ("PSAPs"), and will coordinate the roll-out of E-911 Phase II ALI between the PSAPs and the wireless carriers operating in the state. To date, the state agency has not determined which type of technology to deploy. However, as we understand it, the decision will be reached based upon the outcome of field tests currently being conducted in the Los Angeles area by the state agency in conjunction with the large wireless carriers operating in the state. As we further understand it, the approved state-wide model will most likely call for the deployment of ALI equipment manufactured either by the Grayson Wireless Division of Allen Telecom ("Allen Telecom") or by TruePosition. Thus, at present, it appears likely that we will deploy either the Allen Telecom or the TruePosition solution, as may be requested by the state agency.

In addition, local governments in our operating area stringently regulate the placement of additional antennas on existing towers, and obtaining the required governmental approvals can be an unduly prolonged and time consuming process frequently entailing more than six months to complete. Therefore, absent preemption of these local requirements by the State of California, our ability to deploy Phase II ALI in a timely manner will be subject to and conditioned upon our ability to expeditiously obtain from the relevant local authorities the approvals needed to install the ALI antennas on the existing towers which serve as our cell site locations.

Furthermore, it should also be emphasized that, at present, the ALI equipment is still in the research and development stage, and, as a result, none of the equipment is ready for commercial deployment. The final selection will be based upon a combination of coordination with the state agency, pricing, technical suitability, and receipt of an acceptable equipment delivery date, once the equipment is ready for commercial deployment.

2) Testing and Verification: With respect to the actual deployment of a commercial system, there is very little information available from the vendors. Accordingly, it is difficult to devise a testing methodology for a commercial system. We intend to purchase a "turn-key" system, with testing and verification performed by the manufacturer prior to our acceptance of the installation. Thereafter, we anticipate regular testing of random locations throughout our service area, beginning in areas where the PSAP has requested Phase II deployment.

However, notwithstanding the foregoing, the following testing and verification methodology looks promising: Each individual wireless base station will have test calls placed on it utilizing various models of portable and 3 watt subscriber units. These tests will be performed using both AMPS and TDMA handsets. The geographic location of the subscriber unit can be verified by using a separate, handheld GPS receiver and comparing the coordinates against the coordinates identified using the ALI equipment's location determination subroutine.

3) Implementation Details and Schedule: We plan to adhere to the implementation schedule established by the Commission in the Fourth Memorandum Opinion and Order, released September 8, 2000. However, our ability to do so will depend, in large measure, on the ability of equipment manufacturers to have their products operational and delivered in a timely manner. No equipment vendor has been able to commit to a firm delivery schedule. It is anticipated that the equipment installation will be performed by the equipment vendor under a "turn-key" contract.

4) PSAP Interface: We anticipate that the PSAP interface will

be as requested by the state agency, which has reached no decisions to date.

5) Existing Handsets: Not applicable.

6) Location of Non-Compatible Handsets: Not applicable.

7) Other Information: Our switch has Phase I ALI capability but, as noted above, the State of California has decided to bypass Phase I ALI entirely in favor of proceeding directly to Phase II ALI. We have received no PSAP requests for Phase II ALI.

Respectfully submitted,

SLO Cellular, Inc. d/b/a Cellular One of San Luis Obispo

Dated: /11-26-01

By: /David Pruett/
David Pruett,
Vice President